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Attorneys for Plaintiff Loujain Hathloul Alhathloul

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LOUJAIN HATHLOUL ALHATHLOUL,

Civil No. 3:21-cv-01787-IM

Plaintiff,

v.

DARKMATTER GROUP,
MARC BAIER,
RYAN ADAMS, and
DANIEL GERICKE

**PLAINTIFF’S UNOPPOSED MOTION
FOR SECOND EXTENSION OF TIME
TO RESPOND TO DEFENDANTS’
MOTION TO DISMISS AND REQUEST
ENLARGEMENT OF PAGE AND
WORD LIMIT**

Defendants.

LOCAL RULE 7-1 CERTIFICATION

The undersigned counsel certify that counsel for Plaintiff have conferred with counsel for Defendants and Defendants do not oppose this motion.

MOTION

Plaintiff Loujain Alhathloul (“Plaintiff”) by and through her undersigned counsel, hereby submits this Unopposed Motion for a Second Extension of Time to Respond to Defendants’ Motion to Dismiss and Request Enlargement of the Page and Word Limit. Plaintiff seeks to extend the deadline for filing a response to Defendants’ Motion to Dismiss up to and until July 21, 2022 and requests permission to exceed the page and word limit by no more than ten additional pages or 2,000 words.

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I. Time Extension

Plaintiff filed her first Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Dismiss on June 9, 2022. (ECF 31). The Court granted that motion and ordered the Plaintiff's response due by July 14, 2022. (ECF 32). Plaintiff now requests an additional seven days to file her response, extending the deadline until July 21, 2022.

This request comes due to the unexpected illness of one of Plaintiff's attorneys. This illness has created unanticipated delay completing Plaintiff's response. Additionally, due to Plaintiff's location overseas and precautions that must be taken to communicate with her, undersigned counsel has faced delay meaningfully consulting with her on the response. These reasons provide good cause for a second extension.

II. Page and Word Limit Extension

Plaintiff also requests permission to enlarge the page and word limit by no more than ten additional pages or 2,000 words.

Under Local Rule 7-2(b)(1), prior approval of the Court is required to file a memorandum that exceeds 11,000 words, or in the alternative, 35 pages.

Plaintiff requests permission to exceed the word and page limit provided in the Local Rules to ensure the response adequately presents all relevant background information and legal arguments for the Court. This request is necessary due to the complex, technical nature of the facts that underpin Plaintiff's claims. These facts involve not only the specific conduct of each of the four Defendants, but the mechanics of the software and hardware at issue. It will benefit the Court to have a complete view of these facts at this stage in the proceeding. Additionally, Plaintiff's filing also must respond to each of the numerous legal arguments asserted by

Defendants in their Motion to Dismiss. This includes responding to theories of agency and jurisdiction, as well as the legal sufficiency Plaintiff's claims brought under two distinct statutes.

Together, these reasons provide good cause for Plaintiff's request.

WHEREFORE Plaintiff hereby respectfully requests that the Court grant this unopposed motion for second extension of time until July 21, 2022 for Plaintiff to file her response to Defendants' Motion to Dismiss and for permission to exceed the page and word limit by no more than ten additional pages or 2,000 words.

Dated: July 7, 2022.

Respectfully submitted,

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